



AB2886 Electronic Reporting Roles and Responsibilities

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<http://geotracker.swrcb.ca.gov/ab2886>

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Overview

A new law in California, AB 2886, is leading the way for business to government electronic reporting of data. This law represents a new trend in regulatory compliance processes - the electronic submittal of data that are currently reported in paper format. New regulations (Article 12, Chapter 16, Division 3, Title 23 of the California Code of Regulations) require individuals submitting compliance reports for Underground Storage Tank (UST) systems to submit data over the Internet to the State Water Resources Control Board (SWRCB) GeoTracker System. These regulations require electronic reporting for all:

- Leaking underground storage tanks (Both petroleum and Non-petroleum releases)
- Operating stations

As of September 1, 2001 soil and water chemistry analytical data included in compliance reports must be electronically submitted. For analytical data reporting details, see the [Guidelines and Restrictions for Electronic Deliverable Format Version 1.2i](#) and the [Electronic Deliverable Format \(Data Dictionary\) 2001 Version 1.2i](#).

As of January 1, 2002, data for groundwater monitoring wells including sub-meter latitude & longitude data, elevation data, depth to water measurements must be

electronically reported. For reporting details, see the [GeoTracker Survey XYZ Guidelines and Restrictions](#).

Electronic Reporting Goals

The SWRCB has several goals in implementing electronic reporting.

1. Electronic reporting will provide decision-makers with more accurate, up-to-date, accessible, and complete statewide information concerning both operating UST sites and sites where there has been a release of fuel and/or solvent chemicals from any component of the UST system.
2. Electronic reporting will enhance the capabilities of the SWRCB, RWCQB and local agencies in assessing and monitoring the threat of MTBE and other contamination to drinking water wells.
3. Electronic reporting will transform public access to information. Unlike hard copy reports currently stored within agency filing cabinets, the public will be able to easily access the information - instead of having to go to a government building to review a hard copy, the public will be able to review and analyze information online.

Who's Involved

There are five parties involved with the transfer and processing of data in the GeoTracker system.

- **Responsible Party (RP).** This is the individual or organization responsible for submission of compliance data. They may be the party legally responsible for cleanup of an unauthorized release or the permittee for an operating site. The RP is legally responsible for the authenticity and accuracy of any electronic data submitted by individuals that they have authorized to the GeoTracker system.

The RP has two primary electronic reporting responsibilities:

- "Claiming" sites before submitting electronic compliance data. (Sites claimed by the RP will be either approved or denied by the SWRCB.)
- Authorizing secondary access to allow contractors or laboratories to submit compliance data on their behalf for an individual site

Responsible Parties (who do not have Internet access or that do not wish to perform the electronic role of the RP) may delegate these primary electronic reporting responsibilities to a contractor. In this case, the RP must mail a signed [Electronic Submittal Password Authorization Form](#) to the SWRCB which will authorize the contractor to act on the RPs behalf, as an Authorized RP Agent, to fulfill RP primary electronic requirements. (RPs may revoke this Authorization by signing and mailing an [Electronic Submittal Password Revocation Form](#).)

- **Contractors.** RPs may employ a number of contractors to collect samples, perform groundwater measurements, survey locations and elevations and/or manage data for their facility or cleanup site.

Contractors, RPs or Authorized RP Agents may fulfill secondary electronic reporting responsibilities. Contractors may apply within the GeoTracker pages for secondary access (i.e. request access to specific sites). This access will be approved or denied by the RP or Authorized RP agent.

Secondary electronic reporting responsibilities may include:

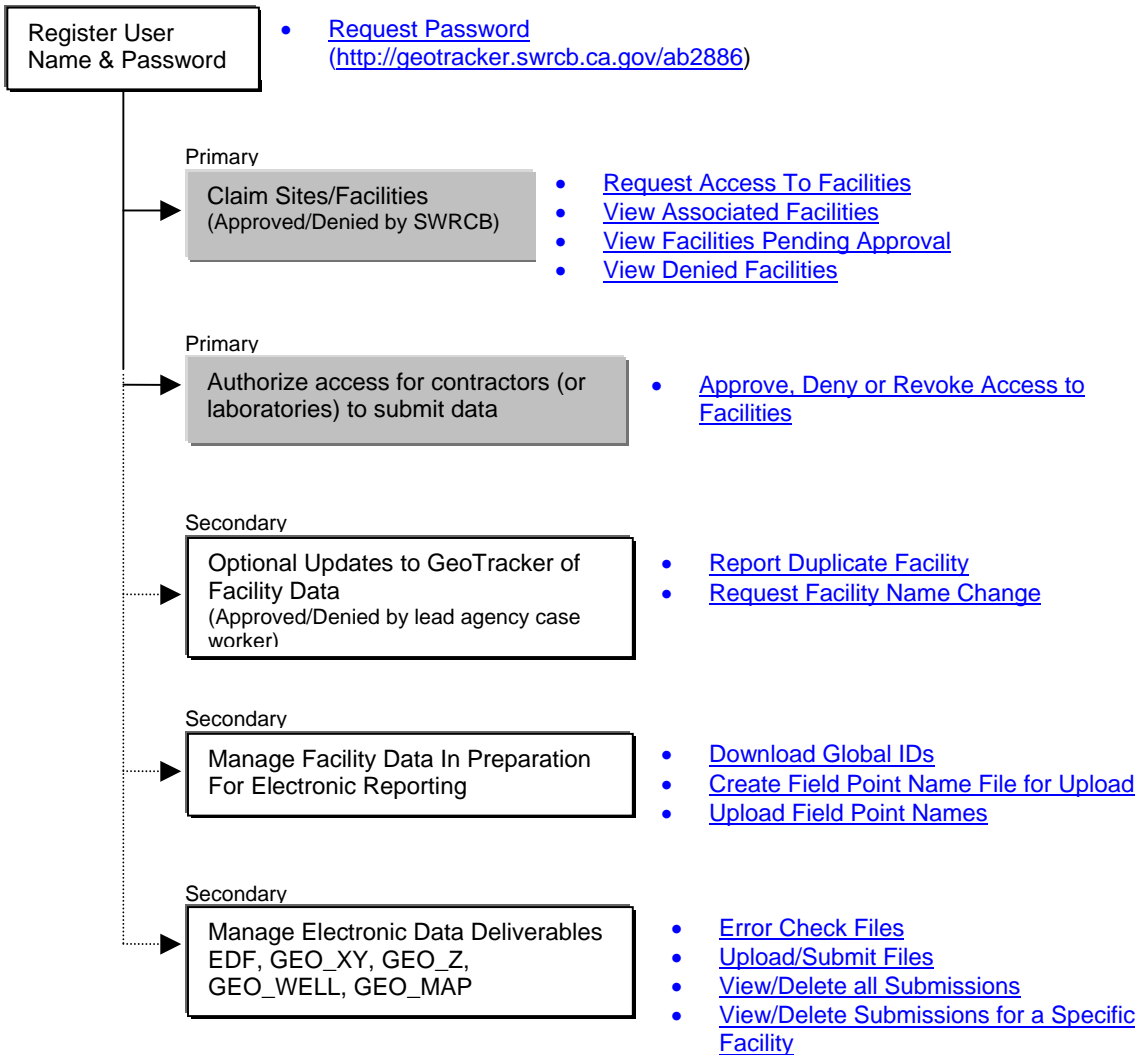
- Upload of a list of “Field_Point_Names” to GeoTracker (sampling point names within each site)
 - Obtaining the unique Global ID for each site
 - Providing the Global ID and Field Point Names to the analytical laboratory on the normal chain-of-custody so that the laboratory can produce a complete EDF file.
 - Ensuring that the field point names and Global IDs are correct within each electronic submission file (see GeoTracker Tips 1 & 2 for sample and QC naming conventions).
 - Submitting electronic compliance data via the GeoTracker Internet site (EDF, GEO_XY, GEO_Z, GEO_WELL, GEO_MAP)
- **Laboratory.** The laboratory is responsible for sample analysis and providing the RP/Contractor with both a hard copy report and EDF formatted data.

In some cases, the RP may wish to have the laboratory submit the EDF data directly to GeoTracker. The laboratory would apply for secondary reporting access for these sites and that access will be approved or denied by the RP or the Authorized RP Agent. In the vast majority of cases, RPs do not ask the laboratory to be responsible for uploading the EDF to the GeoTracker system. Typically the laboratory will forward the electronic files to the RP/Authorized RP Agent or the Contractor who will first review the files (ensure the sample names and site global ID are correct) before submission to the SWRCB GeoTracker system.

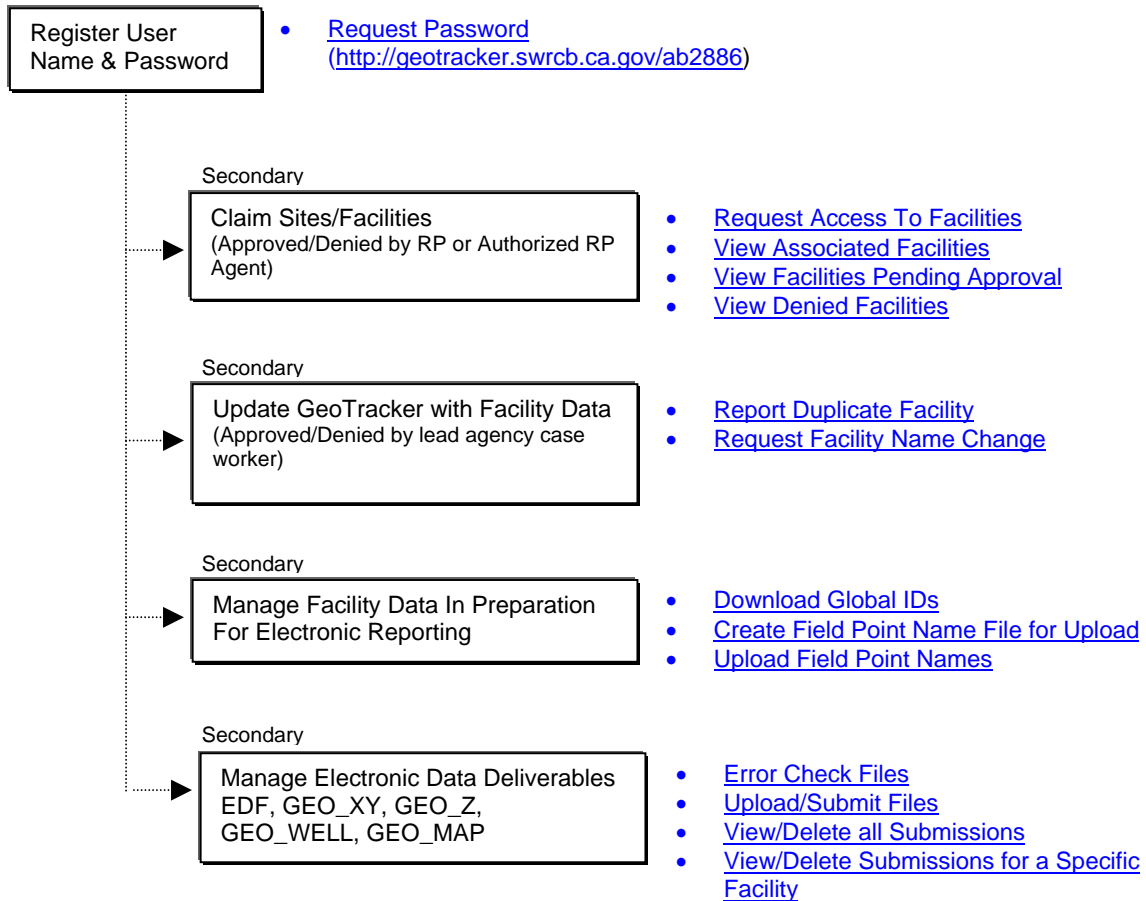
- **SWRCB.** The SWRCB is responsible for approving RP claims for facilities and for verifying RP contact information. The SWRCB also is responsible for providing guidance and tools to standardize the review and quality of electronic compliance data submitted.
- **Lead Agency Case Worker.** The lead agency case worker “receives” the electronic data. At minimum, this includes a review the field point names in the EDF (should match names in hard copy report) and noting whether the hard copy report has been submitted within the GeoTracker regulator pages. Once the data is “received” it is then moved into the GeoTracker archive database and made available to the public.

Electronic Reporting Roles and Responsibilities

The **RP or the RP Authorized Agent** must perform all Primary electronic reporting responsibilities (gray boxes). The RP or Authorized RP Agent may perform Secondary electronic reporting responsibilities (white boxes) or can authorize contractors (or laboratories) to perform Secondary electronic reporting responsibilities.



Contractors (or Laboratories) may perform all Secondary electronic reporting responsibilities (white boxes).



Generalized GeoTracker Dataflow

